

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF IOWA  
WESTERN DIVISION**

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<b>UNITED STATES OF AMERICA,</b>	)	
	)	<b>Case No. 1:15-CR-048</b>
<b>Plaintiff,</b>	)	
	)	
<b>vs.</b>	)	
	)	<b>DEFENDANT'S MOTION TO</b>
<b>BEAU CROGHAN,</b>	)	<b>CONTINUE TRIAL AND TO</b>
	)	<b>EXTEND PRETRIAL MOTIONS</b>
	)	<b>DEADLINES</b>
<b>Defendant.</b>	)	

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COMES NOW, Defendant, Beau Croghan, through counsel, and moves for a continuance of the trial date and an extension of the pretrial motions deadline. In support of said motion, counsel states:

1. The defendant is charged with Access or Attempt to Access Child Pornography, a violation of Title 18 U.S.C. §§ 2252A(a)(5)(B).
2. Trial is currently scheduled for January 11, 2016.
3. Additional time is needed to review discovery to prepare for trial or determine plea options. Counsel is requesting that the trial in this matter be continued.
4. Counsel for the defendant is also requesting that the pretrial motions deadline be extended.
5. Counsel has conferred with Richard Rothrock, the AUSA prosecuting this case, and he does not oppose this motion.
6. Because the ends of justice served by granting this continuance outweigh the best interest of the public and the defendant in a speedy trial, the period would be excludable for speedy trial purposes.

WHEREFORE, counsel for the defendant respectfully requests a continuance to the first trial period in March and for an extension of the pretrial motions deadline.

/s/ Michael L. Smart  
MICHAEL L. SMART  
ATTORNEY FOR DEFENDANT

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CERTIFICATE OF SERVICE

I hereby certify that on January 5, 2016, I electronically filed this document with the Clerk of Court using the ECF system which will serve it on the appropriate parties.

/s/ Geralynn Fjeldheim

cc via ECF: AUSA